

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)

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THIS DOCUMENT RELATES TO:
ALL CASES

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**LEAD PLAINTIFF'S OPPOSITION TO DEFENDANT
SONUS NETWORKS, INC.'S MOTION FOR LEAVE TO
FILE SUPPLEMENTAL MATERIALS PURSUANT TO LOCAL RULE 7.1(B)(3)**

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Lead Plaintiff hereby opposes defendant Sonus Networks, Inc.'s Motion for Leave to File Supplemental Materials Pursuant to Local Rule 7.1(B)(3), filed December 2, 2005.

This matter is scheduled to be argued on December 7, 2005. Defendants' papers in support of their pending motions were filed on September 12, 2005 and October 24, 2005, respectively. The proposed submission is grossly out of time. It does not involve any newly generated materials or case law. Rather, the submission includes copies of SEC filings which were created by Sonus and available to it since they were submitted to the SEC in 2002 and March 2005. Further, defendant nowhere explains the relevance of its supplemental submissions, leaving the Court and Lead Plaintiff to speculate as to how the portions of certain SEC filings relate to the arguments previously made. This is highly inappropriate, and an obvious attempt to sandbag Lead Plaintiff with new arguments which Sonus apparently intends to raise at the hearing.

This procedure is fundamentally unfair. All parties have had a full opportunity to present their positions in writing to the Court pursuant to the Court-ordered briefing schedule. Sonus's unexplained eleventh hour submission should be rejected.

Dated: December 5, 2005

GOLD BENNETT CERA & SIDENER LLP

By /s/ Solomon B. Cera

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CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby declare under penalty of perjury as follows:

I am employed by Gold Bennett Cera & Sidener LLP, 595 Market Street, Suite 2300, San Francisco, California, 94105-2835. I am over the age of eighteen years and am not a party to this action.

On December 5, 2005, a true and correct copy of the aforementioned **“LEAD PLAINTIFF’S OPPOSITION TO DEFENDANT SONUS NETWORKS, INC.’S MOTION FOR LEAVE TO FILE SUPPLEMENTAL MATERIALS PURSUANT TO LOCAL RULE 7.1(B)(3)”** was delivered to all counsel of record by electronic service pursuant to the Court’s Order Regarding Electronic Service.

Executed on December 5, 2005, at San Francisco, California.

A handwritten signature in cursive script, reading "KimLane E. Gantan", is written over a horizontal line.

KimLane E. Gantan